

Privacy Policy (Employer)

1.1 Collection of Personal Information

1.1.1 When you register for the dreamtalents services:

1. The first time when company and employer register with dreamtalents for any of the dreamtalents services, company will be asked to provide certain information in order to create a dreamtalents account.
2. Whenever the company information requested by dreamtalents is marked as “Required Field”, company must provide and agree to the processing of this company information by dreamtalents.
3. If you do not agree to provide this company information and/or not agree to us processing it in the manner set out in this Privacy Notice, then dreamtalents will be unable to provide the relevant services to you and your application for such services will be rejected.

1.1.2 From your use of the dreamtalents services

We collect company information directly from you when you choose to engage with any of the dreamtalents services. The following are examples of company information dreamtalents may collect directly from you.

i. Company Name

ii. Employer’s Name and designation

iii. Company’s background

iv. Job details

v. Employer’s personal information

1. If you wish to stop dreamtalents from processing these types of personal information about you, dreamtalents will no longer be able to provide the relevant services to you.
2. In addition, dreamtalents may ask your permission to post your testimonial or success story. If you agree to post your material on dreamtalents, you should be aware that any personal information you submit can be read, collected, or used by other users of the dreamtalents and could be used to send you unsolicited messages. If you wish to update or delete your testimonial, you can contact us.

1.1.3 From your use of the dreamtalents Services

1. When you visit the dreamtalents website, our web servers automatically collect information about your visit to these websites, including your Internet Protocol (IP) address, the time, date and duration of your visit. your IP address is a unique identifier for your computer or other access device
2. dreamtalents may track your visits to any dreamtalents by placing a “cookie” on your computer or other access device when you enter. Cookies are small text files that are placed on your computer or other access device by websites that you visit. They are widely used in order to make websites work, or work more effectively, as well as to provide information to the owners of the websites.
3. Cookies allow dreamtalents to save preferences for you so that you will not have to re-enter them the next time you visit. Cookies also help dreamtalents collect anonymous clickstream data for

tracking user trends and patterns. dreamtalents may use the anonymous click stream data to help the Advertiser to deliver better-targeted advertisements.

4. You can remove cookies by following directions provided in your internet browser's "help" file. You should understand that areas of certain websites will not function properly if you set your internet browser to not accept cookies.

5. dreamtalents also uses clear gifs in its HTML-based emails in order to find out which emails have been opened by the recipients. This allows dreamtalents to gauge the effectiveness of certain communications and the effectiveness of its marketing campaigns.

6. Our partners and service providers use cookies to collect information about the usage of dreamtalents. The use of cookies by our partners and service providers is not covered by our privacy policy. We do not have access or control over these cookies.

1.2 Purpose of collecting and use of personal Information

1.2.1 The purposes for which dreamtalents processes your personal information are as follows:

1. To verify your identity.
2. To assess and/or verify your employability and credit worthiness;
3. To provide the dreamtalents services which you have requested;
4. To administer and manage the dreamtalents services provided to you;
5. To contact you in respect of dreamtalents services;
6. To process your order for the dreamtalents services which you have requested;
7. To investigate and resolve any of the dreamtalents services, billing queries, complaints or other enquiries that you submit to dreamtalents regarding dreamtalents services;
8. To manage staff training and quality assurance;
9. To monitor and improve the performance of the dreamtalents websites and the dreamtalents services;
10. To maintain and develop the dreamtalents websites;
11. To gain an understanding of your information and communication needs in order for dreamtalents to enhance and customize the dreamtalents services;
12. To conduct research and development and statistical analysis in connection with the dreamtalents services to identify trends and develop new services that reflect your interests;
13. To detect and prevent fraudulent activity.

1.2.2 You are not able to limit the processing of your personal information for the purposes set out in Clause **(1.2.1)** above. If you do not consent to dreamtalents processing your personal information for the said purposes, you must terminate your relevant agreement with dreamtalents for the dreamtalents services and may stop using the dreamtalents Websites.

1.2.3 dreamtalents will ask for your consent before processing your personal information other than those set out in Clauses **(1.2.1)**.

Privacy Policy (Job Seeker/ Fresh Graduate)

1.1 Important Information and who we are

This Privacy Policy sets out our firm commitment to the privacy of our users ("users" or "you") and how we collect and use your personal data. Please read this Privacy Policy carefully. By accessing our Site, using our services and, where relevant, expressly accepting this policy, you acknowledge that you have read and agree to the terms of this Privacy Policy. We respect your right to privacy and will only process personal information you provide to us in accordance with the applicable privacy legislation in the jurisdictions in which we operate, including the Personal Data Protection Act 2010 and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time and then any successor legislation to the PDPA2010.

1.1.1 Controller: Our Site is operated by PORTMAN College. Our college is located at 2nd Floor, Mines 2 Retail Tower, Jalan Mines 2, E18, Mines Wellness City, 43300 Seri Kembangan, Selangor, Malaysia.

1.1.2 Contact details: If you have any questions about how we collect, store and use personal information, or if you have any other privacy-related questions, please contact us by any of the following means:

1) phone: 03-8941 3733 (PORTMAN Heritage Campus) / 03-8949 3000 (PORTMAN Mines 2 Campus)

2) e-mail: enquiry@portman.edu.my

write to us at our office address above.

We may from time to time, make changes to this Privacy Policy. We will set out any important changes at the end of the Privacy Policy and you should check back regularly to see if there have been any changes to this Privacy Policy. It is important that the personal data we hold about you is accurate and reliable. Please keep us updated if you change your personal data to avoid disputes in future.

1.1.3 Third-party links: Our Site may contain links to third party sites, including sites with which we have affiliate agreements. We are not responsible for the privacy practices or the content of such third party websites. This Privacy Policy extends only to personal data we collect from you either via our Site, or in our dealings with you. We recommend you to check the privacy and security policies and procedures of each and every other website you visit.

1.2 The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

1.2.1 Identity Data includes first name, last name, username or similar identifier, password, date of birth, gender, passport or national ID card data.

1.2.2 Contact Data includes postal address, email address, telephone numbers and instant messaging account details.

1.2.3 Financial Data includes bank account and payment card details.

1.2.4 Transaction Data includes details about payments processed via our Site.

1.2.5 Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, locale, UTM parameters, attribution parameters, browser plug-in types and versions, and operating system, platform and other technology on the devices you use to access our Site.

1.2.6 Usage Data includes information about how you use our Site.

1.2.7 Marketing and Communications Data includes your preferences in receiving marketing from us and third parties and your communication preferences.

1.2.8 We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data), unless specifically provided by you as part of your use of our service. We do not collect any information about criminal convictions and offences.

1.3 How is your personal data collected?

We may collect information about you in a number of ways, including:

1.3.1 Direct interactions. Most of the personal data we collect about you will be personal data you provide to us. For example, you may give us your Identity, Contact and Financial Data by filling in a form on our Site or if you correspond with us via phone, email, instant messaging service, speak to us at an event or otherwise. This includes personal data you provide when you:

- enquire about our products or services;
- create an account on our Site;
- request marketing to be sent to you;
- give us feedback.

1.3.2 Automated technologies or interactions. As you interact with our Site, we may automatically collect Technical Data such as information about your browser, what areas of our Site you visit and what links you click on, browsing actions and patterns. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies and other similar technologies. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

1.3.3 Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics and search information providers;
- Identity and Contact Data from affiliates, referral partners or advertisers on our Site;
- If you log in using social media depending on how you log in we may collect Contact, Identity and Technical Data, including: your profile name/username, profile picture, email address and date of birth. The social media information you consent to share with us will be combined with the other information you provide to us or that we collect about you.

We will also keep a record of our conversations with you, whether by phone, email or in person.

1.4 How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

1.4.1 Where we need to perform the contract we are about to enter into or have entered into with you.

1.4.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

1.4.3 Where we need to comply with a legal or regulatory obligation.

1.5 Disclosures of your personal data

In some instances, we may need to share your personal data with the parties set out below:

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties such as job advertisers and affiliate third parties so that they can get in touch about your information or personal data. Equally, an advertiser may share your personal data with us in order to offer job made via our Sites.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

1.6 Data security

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal data from unauthorized access and disclosure. When transmitting your personal information to a third party (such as an advertiser) in order to complete a request made by you on our Site, we will use commercially reasonable means to secure your personal data. Notwithstanding the foregoing, we assume no liability for interception, alteration or misuse of information transmitted over the internet, except for losses incurred as a result of our gross negligence or default.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

1.7 Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical or accounting purposes in which case we may use this information indefinitely without further notice to you.

1.8 Your legal rights

In certain circumstances, you have rights under data protection laws in relation to your personal data, including:

- the right to request access to your personal data;
- the right to request correction of your personal data;
- the right to request erasure of your personal data;
- the right to object to the processing of your personal data;
- the right to request restriction of processing your personal data;

- the right to request transfer of your personal data; and
- the right to withdraw consent.

If you wish to exercise any of the above rights, please write to us (either by post or by e-mail) at the address specified above.

1.9 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

1.10 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

1.11 Glossary

Lawful basis

Legitimate Interest means our interest in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at enquiry@portman.edu.my.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Internal Third Parties

PORTMAN's Lecturers, Staffs, Students that did not get involved in normal operations of dreamtalents.

External Third Parties

- Service providers acting as processors or joint controllers based worldwide who provide IT, infrastructure, data processing, and system administration services.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based worldwide who provide consultancy, banking, legal, insurance and accounting services.
- Revenue and taxation regulators and other government authorities acting as processors or joint controllers based in the countries in which we operate who require reporting of processing activities in certain circumstances.

1.12 Your legal rights

You have the right to:

1.12.1 Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

1.12.2 Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

1.12.3 Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

1.12.4 Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

1.12.5 Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use

1.12.6 Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

1.12.7 Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

1.13 Collection of personal information of users

1.13.1 The email addresses of users that communicate with dreamtalents via email.

1.13.2 Log file information, including IP addresses. You can visit public areas of the site without identifying yourself or providing any personal information.

1.13.3 Tracking IP addresses (the computer's internet address).

1.13.4 Monitoring how long a user spends on the site and which pages he/she visits - this helps us evaluate the use of different parts of the website.

1.14 Use of personal information collected

1.14.1 We are the sole owners of the information collected on this site. We only have access to/collect information that you voluntarily give us via email or other direct contact from you. We will not sell or rent this information to anyone.

1.14.2 We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request, e.g. recruitment agency.

1.14.3 Unless you ask us not to, we may contact you via email in the future to clarify on the matter.

1.15 Personal data

You have the right to:

1.15.1 Find out what personal data we process about you and obtain a copy of the data, free of charge.

1.15.2 Ask us to correct inaccurate or incomplete data. If you think we are acting unfairly or unlawfully you can:

- Object to the way we are using your data.
- Complain to the related department.
- Under certain conditions you also have the right to ask us to
- Restrict the use of your data e.g. if you have raised issues about the accuracy or use of your personal data, until we have investigated and responded to your concerns.
- Erase your information or tell us to stop using it to make decisions about you.
- Comply with your wishes where you have previously agreed to us processing your data for a particular purpose and have withdrawn your consent to further processing.

1.16 Registration

1.16.1 All information received by us from your registration in accordance with our Privacy Policy. Kindly read the below mentioned details.

1.16.2 To register on the dreamtalents website, you must be 18 years of age or above. We expect you to provide an accurate and complete information of the compulsory fields. You must ensure that the details provided by you on registration or at any time are correct and complete.

1.16.3 You must inform us immediately of any changes to the information that you provided when registering by updating your personal details in order that we can communicate with you effectively.

1.16.4 We also expect you to keep the information secure, specifically access passwords and payment information. Kindly update the information periodically to keep your account relevant. dreamtalents will rely on any information you provide to us.

1.16.5 Each registration is for a single user only. You will choose a username and password. You are not allowed to share your username or password or give access to your account to anyone else. Do not allow multiple users on a network or within an organization to use the same account.